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March 10, 2023

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VIA ECF AND EMAIL

The Honorable Jesse M. Furman
United States District Judge
40 Centre Street, Room 2202
New York, New York 10007

Re: *Abby R. Simpson and G. Todd Myland v. Pacific Indemnity Company*, No. 1:23-cv-01436-JMF

Dear Judge Furman:

In accordance with Rule 2E of Your Honor's Individual Rules and Practices in Civil Cases, we respectfully submit this letter-motion on behalf of all parties to set a new schedule in light of Plaintiffs' decision to file an amended complaint. Under the Court's February 23 and 27, 2023 orders, the date for Defendant Pacific Indemnity Company to answer or move against the complaint is March 30, 2023, and the initial conference is scheduled for April 19, 2023. The parties now propose that Plaintiffs file their amended complaint by March 29, 2023, that Pacific file its answer or motion to dismiss by May 5, 2023, and that the Court adjourn the initial case conference until a date in mid-to-late May.

This is the parties' first joint request for an extension. As referenced above, the Court on February 27, 2023 (ECF No. 8) granted Defendant's request for a 30-day extension of the original February 28, 2023 deadline to answer or move against the complaint. Aside from this previous extension and the initial case conference, the Court has not scheduled any dates or deadlines in this matter.

Application GRANTED. The initial pretrial conference, currently scheduled for April 19, 2023, is hereby ADJOURNED to **May 17, 2023, at 9:00 a.m.** Additionally, Plaintiffs' counsel should file a notice of appearance on the docket forthwith.

The Clerk of Court is directed to terminate ECF No. 9.

Respectfully,

/s/ Jonathan Rosenberg
Jonathan Rosenberg
Counsel for Defendant

/s/ Johnathan Lerner
Johnathan Lerner, Esq.
Counsel for Plaintiffs

SO ORDERED.

March 13, 2023